CIVIL SOCIETY EUROPE

European Center for Not-for-Profit Law

Participation of civil society organisations in the preparation of the EU National Recovery and Resilience Plans

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INTERNATIONAL CENTER FOR NOT-FOR-PROFIT LAW

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Introduction

This Report was prepared for Civil Society Europe (CSE) in cooperation with the European Center for Not-for-Profit Law (ECNL) and with funding by the International Center for Not-for-Profit Law (ICNL), and has three main aims:

- inform CSE members and broader Civil Society Organisations (CSOs) about involvement of civil society in preparation of the National Recovery and Resilience Plans (NRRPs)
- create dialogue with key institutional actors regarding strengthening CSO involvement
- develop recommendations to the EU institutions, national and regional authorities and CSOs themselves, on how to improve CSO engagement throughout the whole process.

What is the National Recovery and Resilience Facility?

The European Commission proposed the Recovery and Resilience Facility (RRF) on 27 May 2020 as the centrepiece of NextGenerationEU, a temporary recovery instrument that allows the Commission to raise funds to help repair the immediate economic and social damage brought about by the coronavirus pandemic. The RRF is also closely aligned with the Commission's priorities ensuring in the long-term a sustainable and inclusive recovery that promotes the green and digital transitions.

On 17 December 2020, the Council of the EU decided to adopt the next long-term EU budget for the period 2021-2027, which is the final step in the adoption process. With this decision, all the conditions have now been fulfilled for the next Multiannual Financial Framework (MFF) for 2021-2027 to be in place as of 1 January 2021. As a result, €1.074 trillion [in 2018 prices] will become available for beneficiaries of EU funding during the next seven years[1].

1 https://ec.europa.eu/commission/presscorner/detail/en/IP_20_2469

The main novelties compared to the 21 July agreement at European Council level are: a reinforcement of priority programmes of €15 billion; a clear commitment that 30% of the EU budget, under both MFF and NextGenerationEU, will be spent to fight climate change; a specific attention to biodiversity protection and gender related issues; increased budget flexibility and protection mechanisms; and a roadmap towards new own resources.

The Recovery and Resilience Facility (RRF), which is a key element of the MFF, will make €672.5 billion in loans and grants available to support reforms and investments undertaken by Member States. The aim is to mitigate the economic and social impact of the coronavirus pandemic and make European economies and societies more sustainable, resilient and better prepared for the challenges and opportunities of the green and digital transitions.

On 18 December 2020, the German Presidency of the Council of the EU and the European Parliament reached a provisional agreement on the RRF, confirming the financial envelope of 672.5 billion € proposed by the European Commission. The agreement set out that at least 37% of each Plan's allocation has to support the green transition and at least 20% the digital transformation. Support will be closely linked to the recommendations of the European Semester, which identify central challenges for each member state to address to strengthen competitiveness as well as social and economic cohesion. In addition, it was agreed that the European Parliament will be more closely associated throughout the lifespan of the implementation of the facility, including through a Recovery and Resilience Dialogue[2].

Member States will prepare National Recovery and Resilience Plans (NRRPs) that set out a coherent package of reforms and public investment projects. To benefit from the support of RRF, these reforms and investments should be implemented by 2026.

Each Plan is expected to contribute to the four dimensions outlined in the 2021 Annual Sustainable Growth Strategy, which launched this year's European Semester cycle:

- Environmental sustainability
- Productivity
- Fairness
- Macroeconomic stability.

Member States should submit their NRRPs at the latest by 30 April 2021. They may wish to send a draft Plan as from 15 October 2020. The deadline for final payment will be the end of 2026. This implies an end date of July 2026 by which all milestones and targets are to be achieved. However, some Member States have already indicated that they might not be able to comply with the 30 April deadline for the submission of the final Plan[3].

2 https://www.consilium.europa.eu/en/press/press-releases/2020/12/18/recovery-and-resilience-facility-council-presidency-and-parliament-reach-provisional-agreement/#

3 For further information see the Guidance note for Civil Society Organizations to engage with National authorities on the preparation of the EU National Recovery and Resilience Plans, at https://civilsocietyeurope.eu/wp-content/uploads/2020/12/Guidance-Note-for-CS-to-engage-with-the-National-Recovery-and-Resilience-Plans.pdf

Engagement of CSOs along the full cycle of NRRPs in the RRF regulation and more recent guidance documents

In the Commission's proposal on RRF, there is no obligation to engage with relevant stakeholders, including CSOs, in the preparation, implementation and monitoring of the NRRPs.

The Guidance note issued by the European Commission in September on the preparation of NRRPs invites "Member States to publish their Plans to enable the European Parliament, the other Member States, the Commission and the public at large to have an overview of what the recovery and resilience Plan will achieve". The Guidance also asks that "Member States should detail the processes and structures set up at national, regional and local levels to ensure complementarity and coordination of the management of various Union sources of funding". Member States are also invited to "describe any consultation and contribution of social partners, civil society and other relevant stakeholders, in the drafting and implementation of the recovery and resilience Plan"[4].

Although this is very positive, the Guidance note cannot set any legal obligations on Member States. The European Parliament proposed an amendment to article 15.2 of the Regulation, to address this shortcoming: "...A Member State wishing to receive support under the Facility shall establish a multilevel dialogue, in which local and regional authorities, social partners, CSOs, in particular youth organisations, and other relevant stakeholders and the general public are able to actively engage and discuss the preparation and the implementation of the recovery and resilience Plan. The draft Plan shall be submitted to the attention of local and regional authorities, social partners, CSOs, in particular youth organisations, and other relevant stakeholders and the general public for consultation before the date of submission to the Commission and social partners shall have at least 30 days to react in writing, in accordance with the principle of partnership". As the final text of the adopted RRF is not available at the date when this report has been delivered, it is not possible to know if this amendment has been carried by the Council of the EU or if the text has been deleted or amended.

Two other flaws that can be identified in the Commission's proposal for regulation are the absence of any references to the partnership principle enshrined in the Common Provision Regulation laying down the common rules to ESIF and to the European Code of Conduct on Partnership, as well as of a provision clearly identifying which actors can be implementing actors of the RRF funds. Concerning this specific aspect, it seems that the Parliament's proposal does not include any improvement. This point was discussed with a member of the European Commission's Recovery and Resilience Taskforce who participated in the meeting organised by CSE and the European Environmental Bureau on 17 December 2020. It was pointed out that the regulation leaves this point open to Member States to choose which tools to use for the implementation of the Plans: public procurement, public-private partnerships and grants. It

4 See Commission Staff Working Document, Guidance to Member States - Recovery and Resilience Plans, 17.09.2020, SWD (2020) 205, part 1, p. 33, available at https://ec.europa.eu/info/departments/recovery-and-resilience-task-force_en

would also be possible for CSOs to become intermediary bodies in the implementation of the funds, as it happens with ESIF.

The authors view is that if this is to be acknowledged, practice shows that public procurement procedures and public-private partnerships are not the most inclusive tools to include CSOs as final beneficiaries, as they tend to be accessible only to very large organisations, which are usually for profit. Public procurement in itself is more accessible to small and medium enterprises (SMEs), CSOs and social economy organisations, when contracting authorities decide to divide the contract into lots, use reserved contracts or include social and / or environmental considerations in award criteria or in contract performance clauses. A recent study conducted on behalf of EASME and DG GROW on socially responsible public procurement concludes that these options are not commonly used by contracting authorities across the EU[5].

On 15 December 2020, the Technical Support Instrument (TSI) was adopted by the European Parliament's Budgets and Economic and Monetary committees with the Council. It will assist national authorities in preparing, amending, implementing and revising their national Plans. The text sets out a list of key actions to be carried out, such as digitalisation of administrative structures and public services, in particular healthcare, education or the judiciary, creating re-skilling policies for the labour market and building resilient care systems and coordinated response capabilities. In order to receive technical support, a member state should submit a request to the Commission by 31 October of a calendar year, identifying the policy areas they will focus on. For the purposes of democratic accountability and visibility, Parliament obtained to receive annual implementation reports from the Commission as the Council. A single online public repository will provide information on the actions under TSI[6].

The agreement reached by the trialogue negotiators includes provisions that allow for a stronger stakeholder engagement. It enables the amendment of Plans by the means of exchange of good practices, appropriate processes and methodologies, and stakeholder involvement. Member States, when requesting for technical support, should be able to consult, where appropriate, relevant stakeholders, such as local and regional authorities, social partners and civil society in line with national laws and practices[7]. The TSI can be used to finance consultations with stakeholders, too.

The text adopted by the trialogue negotiators will now have to be approved first by the two European Parliament's Committees, followed by a plenary vote. The Council will also have to approve the deal.

5 View the brochure of the Buying for Social Impact project, which summarises the key findings of the project and puts forward recommendations to the European Commission, Member States and contracting authorities for a better implementation of socially responsible public procurement.

6 https://www.europarl.europa.eu/news/en/press-room/20201214IPR93930/step-closer-to-recovery-funds-technical-support-instrument-agreed

7 Read whereas 9, articles 4, 7 and 8 of the proposal for a Regulation of the European Parliament and of the Council establishing a Technical Support Instrument - Confirmation of the final compromise text with a view to agreement , available at https://data.consilium.europa.eu/doc/document/ST-13996-2020-INIT/en/pdf

Methodology used to prepare this report

The data and information collection undertaken to inform this report took place in the period 1 to 18 December 2020. Two main tools were used to collect the information. A short survey (annex A) was widely distributed to national members of European level civil society, Networks and Platforms, in particular the members of Civil Society Europe. We aimed to have responses from as many Member States as possible and through this exercise we had 40 responses coming from the following 17 countries: Belgium, Bulgaria, Cyprus, Czech Republic, France, Germany, Hungary, Italy, Latvia, Malta, Netherlands, Poland, Portugal, Romania, Slovenia, Spain and Sweden.

Table 1: CSO sectors which responded to the questionnaire[8]

Sector	No of Responses	Sector	No of Responses
Environment/Climate action	18	Women's rights	8
Social	13	Human rights/non discrimination	6
Cultural	6	Active Citizenship/Volunteering	11
Education	6		

The European Environmental Bureau (EEB) shared similar information they had gathered through a project they worked on engaging: Bulgaria, Czech Republic, Hungary, Poland, Romania, Slovakia and Slovenia. Likewise, a joint Dafne & EFC project shared information they had gathered from philanthropic organisations in: Belgium, Bulgaria, Hungary, Ireland, Portugal and Spain.

It is important to note that the situation in countries may have changed since representatives of CSOs completed the survey. Some of these changes were caught in the second important tool used to collect information for this report, a series of semi-structured interviews carried out by the researchers (annex B - questions for the semi-structured interviews). These interviews were held with representatives from 9 European Networks and Platforms and with

8 Some respondents crossed more than one sector.

17 representatives of National or Regional Organisations active in: Belgium, Czech Republic, Denmark, Germany, Hungary, Italy, Latvia, Lithuania, Netherlands, Poland, Portugal and Spain (see annex C for list of organisations interviewed). Some organisations interviewed belong to the social economy (namely in Denmark, Italy, Poland and Spain). Due to the nature of these organisations and the national legal frameworks on social economy, these actors are sometimes not considered part of CSOs, or are considered social partners (as employers) or belonging to a grey zone between CSOs and SMEs (as most of them are SMEs).

The choice of whom to interview came from the responses to a call to CSOs to suggest people to interview from organisations that were invited or who sought to be active in the consultation on the NRRPs. With these two tools input was received from 21 countries for this report.

The draft report was discussed and amended following discussions with the Task Force on NRRPs in Civil Society Europe. Input from the exchanges held at the online seminar organised by Civil Society Europe and the European Environmental Bureau held on 17 December 2020 was also integrated into the report. Information gathered from media reports, and public letters on the Plans, was also included in the report. The specific input from the national level was checked with the interviewees.

This report is based on the views expressed by the respondents and the interviewees, which were collected in a very short timeframe. Thus, the findings of this report should not be considered exhaustive and comprehensive. Member States are at different stages in the development of the Plans. In addition, the level of engagement of stakeholders, including CSOs, is still an ongoing process.

How were CSOs consulted in preparation of NRRPs?

In the questionnaire to gather information for this report we asked a general question: How do you consider the level of involvement of CSOs by your government / Ministry in charge in the preparation of the National Recovery and Resilience Plans (NRRPs)? Table 2 reflects the answers received.

Table 2: Level of involvement of CSOs in preparation of NRRPs

Options	No of Responses	Options	No of Responses
Well structured	1	Tick-boxing exercise	9
Transparent	1	Too limited	18
Participatory	3	No opinion	5
Non-transparent	22		

It is clear from this table that consultation on the preparation of NRRPs has been very limited in almost all countries. Where we received information from more than one respondent in a country in almost all cases the information was consistent. Based on the information gathered through methodology used for developing this Report we can draw 10 key findings on how CSOs have been consulted to date in the preparation of the NRRPs.

1. **Poor Quality Consultation:** In general, there has been little proactive Government led consultation or engagement of CSOs in the preparation of the NRRPs. With the exception of Portugal and to a lesser extent Italy, respondents from no other countries reported that the consultation was: well structured, transparent or participative. Non-transparent and too limited, were by far the most common answers from respondents. This was also the case in most countries which traditionally have consulted civil society on key EU Plans and Funding Programmes and where structures exist to facilitate such consultation, such as Germany. In Germany, it was reported that there had been some very general discussion with Youth organisations, in the context of the EU Presidency, but no substantial consultation.

Where respondents reported some consultation with civil society actors, it has mainly

been an online exercise with an open call for online submissions, with little or no clear explanation about how the submissions would be followed up. From the countries which provided information for this report, this applies to Belgium, France, Germany, Hungary, Malta, Romania, Slovenia, Spain and Sweden. The best many of our respondents could say about the consultation was that it was a 'tick box' exercise: Bulgaria, Cyprus, Hungary, Italy, Latvia, Poland, Slovenia, and Romania.

2. Failure to use existing consultation structures: It was not easy for CSOs to ascertain which Ministry is leading on the preparation of the Plans. It seems in most cases it is the Ministry of Finance or the Prime Ministers' office. In Poland, the work to prepare for the Plans is coordinated by the Ministry of Funds and Regional Policy (MFiPR). The Ministries who are responsible for the development of these Plans are usually less experienced in consulting with CSOs and seem not to draw on the experience of Ministries who have developed systems for consulting with them. Only respondents from Bulgaria and Italy reported that existing structures had been used to consult on the preparation of the Plans. Responses from Malta confirmed that they are subscribed to consultation processes and have received nothing regarding the Maltese RRP.

Not building on existing consultation systems in place for European Structural and Investment Funds, was a cause for great concern for the representatives of CSOs. There was a common worry expressed that systems that have been built up around the European Structural and Investment Funds (ESIF) and the European Semester process might be undermined by the way the NRRPs - which have links to the National Reform Programmes and the Country Specific Recommendations - are being developed.

3. Uncertain Procedures: There is a great deal of uncertainty about the NRRPs. The links with the National Reforms Programmes, ESIF, and RE-ACT EU are not clear. Difficulties to know how to get involved and consultation meetings getting cancelled at a late stage were reported for example, in Poland and Romania. In Belgium, consultations[9] took place on some guidelines presented by Wallonia Region in the frame of the initiative 'Getup Wallonia' (a Plan for the recovery of Wallonia), but not in the frame of the structures that are in place to consult with CSOs (for example, AVIQ has not been consulted). Nonetheless, it seems that some organisations were consulted because they are considered also as social partners (employers) and not only CSO. This interpretation confirms what two Belgian respondents pointed out: no consultation had been organised and it was unclear if CSO representatives could bring any spontaneous contributions. Furthermore, they reported they had not seen any information on the NRRPs, thus making it difficult to add a contribution.

9 17461 contributions have been received, but there is no link in the proposal with the European Recovery Plan: https://www.wallonie.be/fr/actualites/get-wallonia-grand-succes-pour-la-consultation-citoyenne

In Spain it was reported that there is continuously information popping up in the press of companies that have presented various number of projects, or regions presenting their wish-list to the government, but there is no comprehensive and coherent information. Environmental groups applied for online consultation meetings organized by the Ministry of Development Funds and Regional Policy, in Poland. Unfortunately, these meetings were cancelled just two days before the first meeting, which was to take place on 19 November.

Indeed, this situation is exacerbated in countries where new Governments came into office. This was the case in Slovenia, where the new Government that came into place in March 2020, cancelled the broad working groups for the programming of the cohesion policy, members of which were also representatives of NGOs, trade unions, etc. This leads to information being hard to obtain, drafts proposals that are not available, information is sporadic, and all consultations, except with business sectors and municipalities, are hard to obtain. It is also not clear what will be in the NRRP and what will be in Cohesion Operational Programmes. In Romania online meetings have been postponed until the installation of a new government, which is pending after the recent legislative elections. Romanian CSOs consider that there is need for a rethink of the principles and basic elements on which NRRP is built, so that civil society can contribute to this public debate, not only by "patching" or making small corrections to draft documents which they do not consider as reflecting the necessary vision for society coming from the grassroots or from the practice of civil society. They wrote to the National Ministry responsible for the coordination of the development of the Plan, asking to withdraw the NRRP and rethink the public debate calendar. In this way the consultations with civil society can be fully developed, avoiding to just tick some requirements imposed by European governance standards. It also appears that pending elections in the Netherlands are delaying the process to develop the Plan.

In Slovenia, it seems the government is hoping to finalize the document by the end of December 2020, thus impeding participation of CSOs. In Bulgaria, the government is using a special portal (www.strategy.bg) to conduct all types of public consultations related to new or amended legislation, strategic documents, etc. However, there is no mechanism to inform upfront everyone when a certain consultation starts. One should have to check the site frequently. There is also no system to give feedback on the impact of the consultations. There are structures for consultation, but the procedure to have civil society representatives in these groups are non-transparent and do not respect the ability of CSOs to elect their own representatives.

CSOs in many countries reported concerns with regards to capacity to engage quickly and fully in consultation on these Plans.

4. Late stage consultation: Either as planned or by response to proactive requests for involvement from CSOs, a number of countries have indicated their intention to consult civil society at a later stage. However, it is thought that it will be hard to get substantial changes at that later stage.

In Latvia, it is clear that there are efforts to first gain political agreements between Ministries before wider consultation will be developed. In Belgium, it is hoped that consultation with CSOs will take place in early 2021. In Poland, there is the commitment from the Ministry responsible for coordinating the Plan, that as soon as the draft document is prepared and submitted for consultation, they will also submit it to the members of the Europe 2020 Strategy Team for their opinion. In Spain, there are now commitments to engage but no clear indication of when.

However, some see this late stage consultation as a tick box exercise and say it is difficult to influence Plans once they have been drafted or to have new ideas added. For example, the consultation body for Europe 2020 and the Semester process in Poland, which has representation from CSOs, is supposed to be engaged in reviewing the draft Plan. This was seen by civil society representatives as an information exercise rather than a serious consultation. Even in Portugal - where the authors received positive reports on the way the NRPP is being developed -, some organisations said that Plans to engage them kept being postponed and eventually the Plan was submitted without promised meetings. In Czech Republic, it seems that there will be a round-table on the NRRP in December, in which only members of the Governmental Sustainability Council would be allowed to take part.

By contrast in Italy, consultations took place before the summer on a very preliminary informative note from the government in the frame of the ESF and ERDF Monitoring Committees. More recently, in October, the Advisory Body on the third sector was consulted, too. So far there has been no follow-up to these consultations.

5. Proactive Civil Society Engagement: Where CSOs have been proactive in seeking to engage with the NRRPs and have suggested reforms or projects that could be supported by them, this has had some positive impact in developing engagement with the Ministries responsible. This was reported to be the case in Lithuania and Poland. In Lithuania, CSOs contacted their country desk officials in the European Commission with proposals for social reforms and projects to include in the NRRP. This has resulted in developing the engagement with the Ministries responsible for NRRP. Following requests for involvement, Slovenian environmental organisations have presented and discussed draft proposals with the Government official responsible for the Plan. From the information gathered there are other examples of follow up from proactive civil society efforts for engagement.

Environmental Organisations from Poland, Latvia, Hungary, Czech Republic, have reached out to their Members of the European Parliament (MEPs) to engage with them regarding the Plans. The Polish Green Network had a virtual meeting with a representative from the Ministry of Finance. Environmental organisations in Slovenia had a zoom meeting with the Government official in charge of NRRP to present the draft version of their proposals. Green Restart, a coalition of leading Bulgarian conservation and circular economy NGOs, presented in October preliminary proposals for the Plan. After the first draft of the Bulgarian Plan was published at the end of October, they analysed the Plan and considered that it did not reflect any of the specific recommendations and considerations of the coalition. They have now lodged a detailed formal consultation position containing statements and recommendations by leading Bulgarian experts in each of the NRRP areas. They have not received any detailed response and they are actively following the negotiations in relation to the Plans between their Government and the Commission. In December EAPN Spain, sent a document with proposals to the Office responsible of the Plan, and to the EC desk officer for Spain.

Proactive efforts to engage by Latvian CSOs has resulted in some openness to engaging with them in the further developments of the Plan. Existing good contacts with Ministries are being used to take advantage of this openness. Having good relations with the European Commission Representations is also considered useful. Likewise, in the Czech Republic the proactive efforts of CSOs to engage has slowed the process and opened up room for re-thinking and amending the draft Plan which was noted rather than approved by the Czech Government. The development of a wider platform with actors who have not normally cooperated - ‘change for the better’ - was seen as an important development in the Czech Republic.

In the Netherlands, participative cultural organisations have sought to be involved. They felt they could build on the national measures, which have included their sector, that are being implemented to respond to Covid restrictions. The difficulty of the government to engage with CSOs seems to stem from government reluctance towards the EU level. This situation is made more complicated by pending elections.

However, in Germany, Malta and Spain, where CSOs have sought to be engaged, there was still no response. In Spain, the Spanish Business Confederation of Social Economy (CEPES), requested a meeting with the Cabinet of the Prime Minister, which is in charge of drafting the Plan. Following this meeting, they were invited to the presentation of the draft Plan that was made to the Regions and social partners at the beginning of October. It was not a consultation, just a presentation. The process of preparation of the Plan has been very much centralised and not participatory until now.

6. Involvement of Ministries other than the lead Ministries: Our respondents from social organisations (Spain, Lithuania, Poland) argue that Employment and Social Affairs Ministries were invited to make contributions at a very late stage and struggled to meet deadlines. Thus, in most countries even indirect consultation through the Social Affairs Ministries or Environmental Ministries was not achieved. Spanish respondents reported a meeting they had, on their request, with the Social Ministry, although very limited information was available. It also seems that a coherent vision by the government is lacking and the impression is that each Ministry is working in silos.

In Poland and Lithuania, there are clear proposals from the Social Affairs Ministries for the reform of social services and/or on Housing First and Deinstitutionalisation. These pro-

posals are in general supported by social NGOs, but it is not clear if they will be included in the final Plan.

In addition, some interviewees shared the view that consultation just through Social Ministries would limit their input to perceived social areas and would not include, for example, the social dimension of digital and environmental reforms and projects.

In Germany, the involvement of Ministries such as Economic, Employment and Social Ministries, has enabled some involvement of CSO at working levels, although there was no official involvement. Ministries are expected to give input to the Ministry of Finance, which will ultimately decide the Plan. In France, the Ministry for Employment is proposing a call for expressions of interest on the development of transition programmes in the industry, but it doesn't seem to concern the cultural sector, perhaps with the exception of the music/creative industry. In the Czech Republic, it was reported that so far only the Ministry of Industry has organised participative round tables in relation to the Plan.

There was a general message reported by a number of respondents that even Ministries struggle to meet deadlines they have been given to engage in the preparation of Plans or are not consulted in a proper way.

7. The importance of the Regional and Local levels: The key actors for developing the NRRPs in some countries are Regional Authorities. In Italy organisations that are part of the ESF and ERDF Monitoring Committees have been consulted on the next MFF and in this context also on NextGenerationEU. The regional level is playing an important role in the drafting of the Italian Plan, because the planning and management of EU funds is a subject of shared competence between the central government and Regions. All matters of shared competence, including EU funds and RRF, are discussed in the context of “Conferenza Stato-Regioni” (State-Regions Conference), a collegial body aimed at institutional collaboration between the State and local autonomies.

Germany, which normally has a strong regional approach, seems to have developed the Plan at the Federal level. In Hungary, we hear reports that the Budapest Municipality’s representatives have been excluded from the monitoring committees that could have an influence over the finalisation of the Plan.

In Poland, the Plan was built on the basis of inputs from local and regional authorities. In this case, thousands of proposals were made, and it was very difficult for CSOs to have any information or understanding of many of the projects proposed. Our respondents from Belgium say the investment Plans are compiled solely by the ministers of the regions and the federal government without involvement of CSOs. In Spain, while at the beginning the preparation of the Plan was very much centralised, in a second stage there is engagement happening at regional level where there are task forces for each autonomous region working on the Plan.

There is no information gathered through our research to suggest that consultation at this level was any better structured than national consultations.

8. Civil Society as implementing partners and beneficiaries: The Commission’s proposal for Regulation does not spell out which actors can be considered implementing beneficiaries of the funds during the implementation of the Plans. Some interviewees expressed concerns as at present there is no guarantee that CSOs will receive part of the funds. In some countries, some CSOs or social economy actors have been reassured that they are considered final beneficiaries, however this hasn’t been reflected in the draft Plans so far. In the Spanish draft Plan that was sent to Brussels, it seems there is no reference to CSOs and Foundations. The Spanish Business Confederation of Social Economy asked to become an intermediary body of RRF, as it is the case for the ESF, but this was not accepted. They were promised that some funding will be allocated to the social economy.

At this stage in the process, it was hard to gather concrete information on this topic.

9. Consultation at EU level: no one from the European Platforms or Networks of NGOs interviewed reports having been proactively consulted by the European Commission or other EU institutions in relation to the development of the Recovery and Resilience Facility. Indeed many reported their surprise at the way the facility was developed and the interruption it caused to the Semester process. CSOs from the social sector were concerned with the lack of a clear mainstreaming in the Facility of the social dimension or of the inclusion of a distinct pillar on a socially just transition. This couldbe a step back fromwhat was achieved through the Europe 2020 strategy and the Semester process.

It was also felt that stakeholder engagement in the process could be improved by providing easy access to the lists of the institutions which are responsible for the coordination of the Plans at national level and to draft Plans. The representatives interviewed from the EU networks representing social service providers consider that setting up a ‘help desk’ organised at EU level with antennas in all Member States could facilitate the involvement of social service providers in the implementation and monitoring of NRRPs.

However, similarly to the national level, where European civil society has proactively sought to engage in the process, they have received responses and meetings with key officials from Commissioners’ Cabinets, the Recovery and Resilience Task Force and representatives from relevant European Commission’s DGs. They have also sought and received support from the European Parliament to try and strengthen aspects of the regulation for the RRF. Social CSOs reported discussion on RRF and NRRPs in key committees such as the Social Protection Committee. Presentations of the RRF and discussions on NRRPs

took place in the frame of the European Commission's Expert Group on Social Business (GECES). A dedicated webinar on NextGenerationEU was organised in the frame of the EU Social Economy Summit in November.

The main reason provided by the European Commission for not having consulted with CSOs at EU level is that the preparation of the Plans happens at national level. However, this testifies an insufficient understanding of the important role that CSOs at European level play in informing their members about European processes, empowering them with capacity building measures on how to influence the relevant institutions in their countries, as well as in disseminating information and good practices about CSO engagement on a transnational level.

All EU-level CSOs interviewed said that they themselves, or through the platforms they are involved in, organised specific meetings and developed statements, guidelines or briefings to inform and empower their members. There was a common acceptance of the necessity of wider coalitions to have impact on this process. Cross-sectoral reflection is also seen as essential for this process, for instance linking housing to the Green Deal and housing renovation to affordable housing. How the Plans are implemented and what gets funded is seen as a key test of the seriousness of the commitments taken by the institutional actors who signed the European Pillar of Social Rights.

10. Content of Plans: The concern for the limited participation of CSOs in the preparation of NRRPs is not just a concern about participation, but ultimately a concern that important insights and proposals for the content of the Plans being developed, will be missed. This research exercise, given the short time-scale, is not meant to go in much detail on the content of NRRPs. However, it is important to give a flavour of developments and concerns that were raised by CSO representatives.

The first proposal of the Czech Plan was seen more as a list of projects divided in chapters, lacking in coherence and with an insufficient link to necessary reforms. From the point of view of environmental NGOs, the draft Plan was very poor, there was a common standpoint of NGOs against it and this coupled with concerns about adequate engagement of all relevant Ministries in the preparation of the Plan led to the Government 'acknowledging' rather than approving the Plan that was submitted to the Commision. In Bulgaria, it was considered that funds were largely set aside for infrastructure projects, such as highways, with little focus on reform policies. In Lithuania, there are concerns that most social measures are pointed towards the digitalisation of the social services systems, without addressing the need for new services or improving their quality or accessibility. CSOs in Romanian consider that the Plan needs a complete re-development including to reflect strategic objectives, such as achieving a quality, inclusive, and resilient education system. Similarly, in health, investments in medical infrastructure require a separate approach to respond to the lack of prioritisation in the operational health programs of areas such as neonatology.

In Poland it was considered that the final Plan consists of a list of ICT and green projects selected in the inter-ministerial process, it will be difficult for CSOs to add something to the proposals. In Portugal, there are important challenges and commitments identified in the draft Plan in relation to reform of primary and mental health care, access to housing, children and elder care, and integrated territorial approaches. The Latvian draft Plan seems to have positive proposals in relation to the move from private to public transport. It also contains proposals to improve the fire fighting service, improve flood management, and replanting of forests. However, environmental NGOs consider these proposals as the fulfillment of existing obligations and not an adequate response to the necessary green transition.

In Italy, CSVLazio put forward the proposal to transform about ten protected parks located in the Lazio Region into productive areas based on recycling activities, putting in place circular economy processes while also promoting employment opportunities for persons with disabilities or other people in vulnerable situations. Unofficially, it seems that the Region has accepted this proposal. It is known that the government intends to allocate 6,9 billion € on circular economy, but it is not known how these funds will be used specifically (e.g. for an increase of separate waste collection or for the activation of industrial recycling processes?). Legambiente will submit their proposal in early 2021. In their view, the Italian Plan should become the key instrument to face the economic and climatic crises, coupled with policies to support social inclusion and social cohesion. Their key demands are: invest in green industry, which is Europe's second largest manufacturing industry; develop an integrated national Plan climate and energy; in order to decarbonise the Italian economy, focus on renewable energies and energy efficiency, starting with public buildings, thus creating jobs, as well as on the circular economy and sustainable mobility; rethink cities and urban areas, by improving waste collection, mobility and social relations and by developing citizens' project ownership. The proposals from Confcooperative focus around three main areas: rethink the health system, by developing home healthcare; redesign service provision and forms of living, avoiding the concentration of older people in residential facilities; from an economic point of view, develop forms of associated enterprises and workers buyout by setting up cooperatives[10].

In Belgium, UNIPSO's proposals also focus on an ambitious investment in social services, by focusing on the renovation of social infrastructures, including by improving their energy efficiency, on supporting the digitalisation of services and focusing on training and retraining the workforce, improving the working conditions and the attractiveness of the sector.

10 It is a way in which the workers of a company in crisis or slated for closure engage in the rescue of their company. For some years it has also been an opportunity to restart companies confiscated from organised crime. Workers become their own entrepreneurs by joining a workers' cooperative. Read more: https://workers-buyout-cooperative.it

Case studies - Focus on two countries

Case study no. 1: Portugal and the National Recovery and Resilience Plan

On 17 July 2020 the Government promoted a public event on a Strategic Vision for the 2020-2030 Economic Recovery Plan to which a broad range of representatives from civil society were invited. 21 July was the start of a public consultation to gather contributions over the summer on the document "the Strategic Vision for the 2020-2030 Economic Recovery Plan for Portugal".

The Strategic Vision for the 2020-2030 Economic Recovery Plan of Portugal, was prepared by Prof. António Costa Silva, as a document framing the options and priorities that should guide the recovery of the adverse economic effects caused by the Covid-19 pandemic. It is from this strategic vision that the Recovery Plan is being designed. The hope is that the allocation of the funds be based on strategic thinking about the future of the country. It aimed at formulating a vision for Portugal in the horizon of a decade, a vision that will shape the economic recovery strategy of the crisis caused by the new coronavirus, also serving as a reference for the country's development model in a post-COVID context.

The Draft Plan is built on three key areas, Resilience, Climate Transition and Digital Transition. In the area of Resilience, national options focus on three main priorities, the reduction of social vulnerabilities; the strengthening of national productive potential and the conditions for retaining and creating jobs; and the ambition to ensure a competitive and cohesive territory.

In the first priority, key social commitments are made such as reforms in primary and mental health care, as well as in childcare and elderly care, access to housing, and integrated approaches to support disadvantaged communities in Metropolitan Areas. The second priority focuses on investment and innovation, as well as qualifications and competences. And the last priority is in infrastructures, forest and water management. In the section on welfare reforms, there is an important commitment for evaluating programs in this area, to consider their impact on reducing inequalities, namely gender inequalities.

In the other 2 key areas there are also some relevant social aims. In the section on Climate Transition, important commitments in relation to public transports and energy efficiency (with concerns for energy poverty) have been made. In the area of Digital Transition, actions to promote more digital inclusion are identified (mostly related to the access of computers and internet to children that are in school and need to have remote lessons, due to the pandemic situation).

The Plan is further elaborated around 10 strategic axes: (i) a Network of Indispensable Infrastructures, (ii) the Qualification of the Population, the Acceleration of the Digital Transition, the Digital Infrastructures, Science and Technology, (iii) the Health Sector and the Future, (iv) Welfare State, (v) Country Reindustrialization, (vi) Industrial Reconversion, (vii) Energy Transition and Electrification of the Economy, (viii) Territory, Agriculture and Forest Cohesion, (ix) a New Paradigm for Cities and Mobility and (x) Culture, Services, Tourism and Trade.

By 21 August, at the end of the public consultation, 1153 contributions reached the government. On 5 September a public online event was held, attended by the Prime Minister and several Ministers, to present the new version of the Strategic Vision for the 2020-2030 Economy Recovery Plan for Portugal based on the contributions received. Representatives of CSOs were invited to take part and contribute with responses to the new version of the strategic vision.

Civil Society respondents reported that both the consultant and the government showed an interest in several inputs from CSOs, but some sectors ended up being "more" heard than others. The Portuguese Platform for Womens' Rights reports that the only contribution included explicitly from the ones they provided is in axis (4) Welfare State. "In this area, proposals and suggestions were made that show great concern and commitment in the search for solutions, namely for the areas most affected by the pandemic crisis. It is worth mentioning the suggestions for evaluating programs in this area, considering their impact on reducing inequalities, namely gender inequalities".

On 23 September the Prime Minister and several of its Ministers went to the Parliament for a thematic debate in the context of the Strategic Vision document. On 30 September 2020 a hearing of the Territorial Consultation Council took place. On 14 October there was the Presentation of the 1st version of the Recovery Plan and on 15 October the Plan was submitted to the European Commission.

A chapter dedicated to Governance and Reporting is included in the Plan. In terms of political coordination there will be a steering committee chaired by the Prime Minister and in terms of the technical and management coordination, the Financial Ministry will have a key role. As far as monitoring is concerned, there will be a national commission "chaired by an independent person and it will have a plural constitution, in order to guarantee an adequate sectorial and territorial representation". However, despite some relevant CSOs being represented in the commission (mainly in areas of service provision) it is noted by some civil society representatives that some key actors representing areas such as poverty, social exclusion and local development, are not included in this governance process.

The Plan also contains a chapter explaining the consultation process used.

Case study no. 2 - Italy and the National Recovery and Resilience Plan

In Italy an official consultation on NRRP organised by the government has not taken place. However, there have been a lot of debates on NRPP in the context of many existing structures, advisory bodies, and thanks to the unprecedented mobilisation and leadership of CSOs which have been proactive in organising debates and sending proposals to the government. Italian CSOs seem to be well aware that this is an unique opportunity to change and modernise the country, focusing investments and reforms where it is really needed. Many interviewees feel that the reputation and credibility of the country is at stake, as Italy is the country that will be receiving the biggest portion of the funds. At the same time, there is concern that the government seems to still lack a clear vision of where they want to go.

Ministries have received the order by the Prime Minister to consult as much as possible, including in the frame of the established representation structures. However, a clear steering committee of the whole process is lacking. Some examples are provided below.

First of all, in June the President of the Council conveyed a high level meeting on the state of the Italian economy, gathering all interested parties, including seven important nation-wide NGOs, to collect proposals to relaunch the economy of the country and face the social and economic crises that will necessarily follow the health crisis. It was the first time that RRF was discussed and that the government presented very general lines about the national Plan.

Secondly, still in June, discussions on NRRP took place alongside the consultations on the next MFF held by the ESF and ERDF Monitoring Committees, upon the initiative of the Ministries responsible for those Committees. These Committees are set up at regional level. In the largest Regions, they gather even more than 100 organisations, such as social partners, NGOs, representative networks of local authorities, the regional Forum of Third Sector, Chambers of Commerce, consortia of Municipalities, etc. In the Italian Constitution, the Planning, management and use of European funds is a matter of shared competence between Ministries and Regions. This is the reason why the regional level plays an important role in the drafting of the Plans. Regions have to be consulted in a compulsory way on matters related to EU funds. Discussions were held also in the frame of the Committee in charge of the National Operational Programmes. This marks an improvement compared to the last programming period in which CSOs were not consulted in view of the preparation of the ESIF Operational Programmes. The downside of the consultations carried out in this context is that it is difficult to mark a clear distinction between the proposals put forward concerning the next MFF and those related to NRRP, which should be linked but clearly separated.

Thirdly, consultations were held in October in the frame of the Third Sector Advisory Body ("Consulta del terzo settore"), a body that was set up by the new code of the third sector and which is coordinated by the Ministry for Employment and Social Affairs.

Most CSOs have been proactive and have sent proposals to the government or other relevant Ministries. It has been reported that participative cultural organisations were not included in the consultation. They sought to be involved, but they received no response from the Ministry in charge, which is the Ministry for Culture and Tourism. Culture is promoted as an attraction for tourists rather than cultural participation as defined in the Faro convention. It is expected large cultural institutions will be included in the Plan, but from the perspective of attracting tourists.

The interviewees highlighted some main weaknesses of the overall process, which can be summarised as follows. The first shortcoming is that discussions were held on very preliminary and generic documents submitted by the government in June. Still the draft Plan presented at the beginning of December is more a declaration of intents, based on a translation of the guidelines issued by the European Commission in September rather than a Plan with clear objectives, articulated in specific actions and expected results. It seems that the government still lacks a clear vision. For example, the draft Plan provides that 40% of resources will be devoted to climate action measures, but no mention is made about which specific actions and expected results.

The second perceived weakness is that most CSOs from all sectors have put forward proposals, sometimes generic, sometimes more concrete. Some interviews highlighted that there is a lack of cooperation across CSOs including from the same sector and not only across different sectors. The risk is that there will be too many proposals which might contradict each other. Without knowing what the strategic lines of the Plan are and what the process will be to streamline and make a synthesis of all the proposals in a coherent way, there is fear that many proposals will not be included in the end. All interviewees reported that there have been a lot of declarations from the government and/or the different Ministers that the third sector and the social economy are very important, have played and will continue to play an essential role in providing responses to the health, social and economic crises caused by the pandemic. However, it seems that the government lacks a programmatic vision of how to channel these forces and resources. Not a single CSO interviewed said that they have received official feedback on their proposals. Interviewees report that they receive more information about the Plan from the news than from official sources.

The perception of the interviewees is that, although there is no guarantee, in the end CSOs and social economy organisations will be involved in the implementation of the Plan. In many regions, especially in the north-centre of the country, there is a long-lasting tradition of collaboration between public authorities and CSOs and social economy.

A shared concern from the interviewees is about ensuring that funds are spent in line with the objectives and specific actions that will be contained in the Plan and agreed with the European Commission, and not used for other purposes. For this reason, Legambiente is working with 'Forum Disuguaglianze Diversità' to set up a Monitoring Committee on the use of RRF funds in Italy.

It is worth mentioning that in Italy there has been a strong mobilisation of women in their personal capacity and of women's organisations which call for half of NextGenerationEU funds is allocated to 'integrated gender policies and systemic interventions with a multiplier effect.

This initiative is led by Il Giusto Mezzo, a civic movement composed of women from CSOs.

The action is supported by the analysis of a study commissioned by Alexandra Geese, Member of the European Parliament, and carried out by economists Azzurra Rinaldi and Elisabeth Klatzer, which shows that today, in general, funds are mostly allocated to traditional sectors with a high concentration of male workers, such as construction or transport. On the contrary, the data show that in this crisis the most affected sectors are those with a higher concentration of women, such as health or services provided directly to the person. Therefore, according to Il Giusto Mezzo, this is where we need to start in order to develop a post-pandemic recovery Plan. This study has been followed by the #halfofit campaign launched by Alexandra Geese MEP and the GreensEFA Group in the European Parliament[11].

Assessment of consultation mechanisms and involvement of civil society in the implementation and monitoring of the Plans

The Guidance issued by the European Commission on the preparation of National Recovery and Resilience Plans invites “Member States to publish their Plans to enable the European Parliament, the other Member States, the Commission and the public at large to have an overview of what the recovery and resilience Plan will achieve”. The Guidance also asks that “Member States should detail the processes and structures set up at national, regional and local levels to ensure complementarity and coordination of the management of various Union sources of funding”. Member States are also invited to “describe any consultation and contribution of social partners, civil society and other relevant stakeholders, in the drafting and implementation of the recovery and resilience Plan”.

To make an assessment of the consultation of CSOs in the preparation of NRRPs and their proposed engagement in the implementation and monitoring of Plans we have looked at the information gathered on the consultation processes from the perspective of the principles enshrined in the European Code of Conduct on Partnership (ECCP): representativeness, transparency and accessibility, ongoing involvement, strengthening institutional capacity, review and assessment, and mutual exchange and learning. While it is clear that the consultation to date has been generally poor it is important to assess the practice against the agreed principles. It also works as a way to summarise the consultations that have been carried out todate.

Representativeness: It is clear that in almost all countries with the exception of Portugal that there was no clear and proactive efforts to ensure broad representative engagement in the preparation of the Plans. It is also clear that there is an onus on CSOs to develop sectoral and cross sectoral platforms and coalitions, to ensure engagement in these Plans that represent the broad value based organised civil society. It is particularly important for smaller NGOs that they combine strengths to engage in these Plans.

Transparency and accessibility: From the responses received during this research, the lack of transparency and accessibility has been a huge problem in relation to the preparation of the plas.This is true at all levels, local, regional, national and EU level. There has been almost no clear and transparent processes put in place to facilitate engagement in the Plans. To some extent this emerges from the reality that the Recovery and Resilience Facility had the admiral aim to respond quickly to the unforeseen and enormous demands to respond to the crisis resulting from the necessary retrictions to curtail the Covid-19 pandemic. While this sense of urgency is welcomed, it was also the case that the period from August 2020 to April 2021 envisaged for the preparation of the Plans allowed sufficient time for transparent and accessible processes to be put in place.

Ongoing involvement: Given the weak engagement of civil society in the development of the Plans it could be assumed that it is envisaged that there will be weak processes for ongoing engagement in the delivery, monitoring and review of implementation of the Plans. However without a clearer examination of the content of Plans it is hard to make an informed comment on ongoing involvement in the Plans.

Strengthening institutional capacity: The main concern gathered from the research for this report is that where institutional capacity has been developed for consultation with relevant actors in relation to key EU processes and funds the failure to make use of these institutional arrangements might cause lasting damage to these consultation structures. However the overlooking of these institutional arrangements has caused civil society actors to defend the importance of these structures. There is some evidence that Ministries in some countries have recognised the difficulties that have arisen by not using the consultation structures that are in place and this may lead to ensuring engagement of these structures in future consultations. It is also the case that financial support for engagement of civil society in such processes is weak in most countries. Many in civil society think that it is necessary to allocate a portion of the RRF funds to facilitate consultation. Funding to improve stakeholder engagement should not be limited to organising conferences, meetings and information events. It should also support civil society federations, platforms and coalitions’ work to ensure regular engagement and participation in these processes.

Review and assessment: It is too early to male an assessment of the review and assessment arrangements for National Recovery and Resilience Plans. More developed or final Plans would be needed to be clear about what arrangements for review and assessment are

11 See Success for the #halfofit movement: More justice in EU budgets - Alexandra Geese and Follow-up zu #HalfOfIt – Wie wir Next Generation EU verbessern - Alexandra Geese

being put in place.

Mutual exchange and learning: The absence of structured consultations at all levels hindered the possibility for mutual exchange and learning. Other existing structures and structured dialogue with different Commission Directorate Generals and different Ministries did allow for some exchange and learning. However, it would be fair to say that where exchange and learning was proactively developed it was mostly in relation to sharing of information through platform and coalition work within civil society itself. CSOs and Platforms at European level played a significant role in this regard and were an important source of inspiration and information for national level CSOs.

Recommendations on ways to improve engagement of civil society

General Recommendations, relevant to all governance levels

Reporting on Consultation Processes: it should become standard practice that where consultation processes are part of the guidelines or requirements for the development of Plans, that a standalone report or a distinct section of the report, is devoted to the consultation process. Such reports should include information on: who was consulted, how the selection was made of whom to consult, what the key elements of the consultation were, and what the impact of the consultation was.

Investing in the Consultation Infrastructure: Consultation done well will produce positive results and bring added value to the setting of challenges, the identification of projects and the monitoring and evaluation of implementation of Plans. However, such consultation needs investment at all levels, local, regional, national and EU levels. Particular focus should be paid to see how Federations and Platforms representing the public good are resourced to participate in these processes, in particular the voices representing sections of the society whose interests will not automatically be heard in these processes.

At Regional and National levels

- **Ensure that an adequate and effective architecture for stakeholders' engagement, including CSOs, is in place, including specific capacity building measures and funding** to enable CSOs to participate in the process in a meaningful way. Build on existing consultation frameworks, avoid creating new ones where effective consultation mechanisms exist and develop such frameworks where they don't exist.

- **Involve CSOs across the whole programme cycle of NRRPs**, from consultation, preparation, planning, implementation, monitoring and evaluation of Plans; do not limit consultations to asking for comments on draft Plans, allow the space to identify challenges that need to be addressed, reforms that are necessary and projects to meet the challenges. Ensure that CSOs is considered an implementing partner and beneficiary of the funds. Make use of the Technical Support Instrument to involve CSOs in consultations and as experts, too.

- While drafting the Plans, **include social, environmental and gender considerations in a transversal way**, in all components, both reforms and investments.

- In the implementation period, **ensure that resources from RRF complement and do not replace national, regional and local funds** on some specific social or environmental priorities. Make also a clear distinction between the programming of ESIF and NRRPs, while developing synergies and links.

At European level

To the European Commission

- **Reject Plans that have not demonstrated a clear consultation process involving all relevant actors including CSOs in compliance with the Guidelines issued.** Include adequate time and resources for consultation as key elements of this assessment. Ensure adequate funding for European platforms and networks of CSOs, which play an essential role in empowering their members at national and regional level to get engaged in EU processes, as well as in transferring knowledge from one country to the other and between sectors.

- **Ensure coherence with the partnership principle enshrined in the Common Provisions Regulation and the European Code of Conduct on partnership, as well as respect for other EU funding requirements and commitments**, such as ESIF enabling conditions (including the transition from institutional care to community-based services), (gender) equality, non-discrimination, environmental protection (including the implementation of the 'do not harm' principle), respect for the rule of law, including independence of media.

- **Ensure that Plans include a clear gender assessment, promote gender equality and do not contribute to replicating existing inequalities between women and men** (e.g. promote investment in social infrastructures and ensure that investments are not limited to construction projects whose workforce is male dominated)[12].

- **Involve CSOs in the assessment of the Plans**, for instance by the means of a call for contributions and / or in the frame of the structured dialogue.

- **Ensure that monitoring of the implementation of the Plans is done in a rigorous way, so that funding disbursed is effectively used to meet the priorities, actions and expected results declared in the Plans and agreed with the European Commission**. Ensure that CSOs and all relevant stakeholders are included in the monitoring and that media independence is guaranteed.

12 Read the study "#nextGenerationEU" Leaves Women Behind Gender Impact Assessment of the European Commission Proposals for the EU Recovery Plan by Elisabeth Klatzer Azzurra Rinaldi, commissioned by Alexandra Geese MEP, available at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwiRqqfJ4uPtAhVGyqQKHS43BQAQFjAAegQIAhAC&url=https%3A%2F%2Falexandrageese.eu%2Fwp-content%2Fuploads%2F2020%2F07%2FGender-Impact-Assessment-NextGenerationEU_Klatzer_Rinaldi_2020.pdf&usg=AOvVaw2u81t06UnKohjYerwe4ULw

To the European Parliament

- **Hear Member States representatives responsible for NRRP, any other relevant institutions and stakeholders to discuss their implementation**, including by the means of the Committee on Petitions.

- **Convey the European Commission and Member States' representatives in front of the European Parliament to discuss shortcomings** in the implementation of the NRRP and issue recommendations.

- **Organise an annual hearing of the Budgetary Control Committee to discuss implementation of NRPP**, with direct testimonies from representatives of Member States, regional and local authorities, social partners, CSOs, including women and youth organisations, businesses, social economy enterprises, and any other relevant actor.

To the Council of the European Union

- **Promote exchange of good practices about CSO engagement across Member States**, including youth and women's organisations.

- **Ensure that lead Ministries involve relevant other Ministries**, such as those in charge of employment, social inclusion, youth, gender equality, environment and culture, across the whole NRRP cycle.

- **Ensure that CSO is considered an implementing beneficiary of NRRPs**, whatever the form used to disburse funding (e.g. public procurement, public-private partnerships, grants, etc.).

To Civil Society Actors

- **Consult and engage with other CSOs**, including from other sectors, moving from their comfort zone, to exchange information, understand what is happening in the country, and coordinate input and effort, as much as possible; keep on being proactive in trying to influence the Plans in a concerted way and by learning from each other, not only during the consultation phase, but also during implementation and monitoring of Plans, to ensure that

funding is spent correctly, in line with the priorities, specific actions and expected results agreed with the European Commission.

- **Develop a portfolio of reforms and projects that could be supported by Plans such as the NRRPs**. Prepare a short input to send to your National Government and your country desk in the European Commission outlining a limited number of key demands and proposals from the perspective of Environment, Social, Education and Culture, Equality and Non-Discrimination, that should be included in National Plans. Proposals should demonstrate that they respond to and comply with existing EU laws, frameworks and commitments, such as the Green New Deal, the European Pillar of Social Rights, the Youth Guarantee, the European Parliament's Resolution on the "Cultural Recovery of Europe" (to ensure that employment and social security reforms and investments take into account the specificities of the cultural, creative and heritage workers), the Country Specific Recommendations, ex-ante conditionalities (and future enabling conditions) laid down in ESIF regulations (such as the commitment not to build Institutions but rather to support the shift to community based care), as well as earmarking of funds for climate and digital transformation.

- **Assess the Plans and monitor their implementation in a continuous way:** do a short assessment of whether the input provided has been reflected in the Plans or not, and the overall impact on environmental protection, poverty, social exclusion and social rights, increasing access to culture and fighting inequalities, including gender inequalities. Communicate your inputs to the key Ministries, the country desk officials in the European Commission and through traditional and social media, involving people experiencing poverty and other relevant users' groups highlighting the needs.

Annexes

Annex A: Questionnaire used for the survey

1. Your name

2. Your email

3. Name of the organisation

4. Member State

5. Type of organisation:

   - □ Not for profit organisation / NGO
   - □ Foundation
   - □ Social partner
   - □ Local authority

6. Sector of activity

   - □ Environment / climate action
   - □ Social
   - □ Culture
   - □ Women's rights
   - □ Human rights / non-discrimination
   - □ Active citizenship / volunteering

7. Have you contacted your National Ministry to seek to be engaged in consultation on the National Recovery and Resilience Plans?

   - □ Yes
   - □ No

   If yes, what response have you received?

8. Has your government / Ministry responsible involved your organisation in consultations for the preparation of the National Recovery and Resilience Plans?

   - □ Yes
   - □ No

   If yes, how has the consultation been organised?

   - □ Online meeting(s)
   - □ Online questionnaire
   - □ Call for contributions / call for projects
   - □ Through an existing mechanism of structured dialogue with CSO / stakeholders

   If no, can you please specify?

   - □ A consultation hasn't been organised, but the government / Ministry welcomes spontaneous contributions
   - □ Other - please specify

   Please add more information if you have

9. Are you aware of any other CSOs or other stakeholders that have been invited?

   - □ Yes
   - □ No
   - □ I don't know

   If yes, could you please specify

10. How do you consider the level of involvement of CSOs by your government / Ministry in charge in the preparation of the National Recovery and Resilience Plans?

    - □ well structured
    - □ transparent
    - □ participatory
    - □ not transparent
    - □ tick-boxing exercise
    - □ too limited
    - □ no involvement at all

    Could you please add further information?

11. Please share any other comment

Annex B: Questions used for semi-structured interviews

1. Were you, your organisation, consulted in the preparation of EU National Recovery and Resilience Plans (NRRPs) including self-initiatives to engage?

2. What was your experience of the consultation?

3. Any examples of where issues you want to see addressed are being taken up in the Plans?

4. Do you know what proposals there are to have oversight of the implementation of the Plans?

5. Your recommendations on ways to improve engagement of civil society:

   a. to the European Commission
   b. to National Ministries
   c. to the European Parliament
   d. to Civil Society Actors

Annex C: List of Organisations interviewed

European Networks or Platforms of CSOs

- CECOP - The European Confederation of industrial and service cooperatives (https://cecop.coop)
- Eurodiaconia (https://www.eurodiaconia.org)
- European Association of Service Providers for People with Disability - EASPD (https://www.easpd.eu)
- European Disability Forum - EDF (http://edf-feph.org)
- European Federation of National Organisations Working with the Homeless - FEANTSA (https://www.feantsa.org/en)
- European Network of Cities and Regions for the Social Economy - REVES (http://www.revesnetwork.eu)
- Philanthropy Advocacy - A joint Dafne & EFC project (https://www.philanthropyadvocacy.eu)
- Social Economy Europe (https://www.socialeconomy.eu.org)

CSOs at national or regional level

- Union des entreprises à profit social - UNIPSO (BE)
- Centre for Transport and Energy (CZ)
- CARITAS Germany (DE)
- Kooperationen (DK)
- Spanish Business Confederation of Social Economy - CEPES (ES)
- Clean Air Action Group (HU)
- Confcooperative (IT)
- CSVnet and CSVLazio (IT)
- European Centre for Cultural Organisation and Management - ECCOM (IT)
- Legambiente (IT)
- EAPN Lithuania (LT)
- Civic Alliance Latvia (LV)
- Green Liberty (LV)
- Stichting H401 (NL)
- EAPN Poland (PL)
- Foundation for Social and Economic Initiatives - FISE (PL)
- EAPN Portugal (PT)